

BEFORE THE POLLUTION CONTROL BOARD

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DEC 14 2015

STATE OF ILLINOIS
Pollution Control Board

SUSAN M. BRUCE,)
)
 Complainant,)
)
 v.)
)
 HIGHLAND HILLS SANITARY DISTRICT,)
)
 Respondent.)

No. 2015-139

 ORIGINAL

REPLY TO AFFIRMATIVE DEFENSES

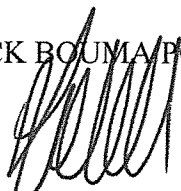
Complainant, SUSAN M. BRUCE, by her attorneys, HUCK BOUMA PC, replies to the affirmative defenses of the respondent. Her reply is as follows:

1. Affirmative defense number 1 is denied.
2. Affirmative defense number 2 is denied.
3. Affirmative defense number 3 is denied.
4. Affirmative defense number 4 is denied.
5. Affirmative defense number 5 is denied.
6. Affirmative defense number 6 is denied.
7. Affirmative defense number 7 is denied.
8. Affirmative defense number 8 is denied.

WHEREFORE, complainant, SUSAN M. BRUCE, requests judgment in her favor and for her costs, and for all other relief deemed appropriate under the circumstances.

Respectfully submitted,

HUCK BOUMA PC



Lawrence A. Stein

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CERTIFICATE OF MAILING

I, Linda Koster, state as follows under penalty of perjury this tenth day of December 2015:

1. I filed this *Reply to Affirmative Defenses* by placing it in an envelope with proper postage prepaid and plainly addressed to State of Illinois, Clerk of the Pollution Control Board, James R. Thompson Center, 100 W. Randolph Street, Suite 11-500, Chicago, Illinois 60601.

2. I served this *Reply to Affirmative Defenses* by placing accurate copies of it in an envelope with proper postage prepaid and by certified mail, return receipt requested, and plainly addressed to Joseph R. Podlewski, Jr., Esq., Heidi E. Hanson, Esq., Podlewski & Hanson P.C., 4721 Franklin Avenue, Suite 1500, Western Springs, Illinois 60558.

3. I deposited the envelopes in the United States mail at Wheaton, Illinois on December 10, 2015.

4. Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.

